

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

LINDA FLINT EDGE,	)	
Plaintiff,	)	
	)	
v.	)	No. 04-12134 DPW
	)	
NORFOLK FINANCIAL CORPORATION	)	
and DANIEL W. GOLDSTONE,	)	
Defendants.	)	

**PLAINTIFF'S PETITION FOR ATTORNEY'S FEES**

The Plaintiff, Linda Flint Edge, by her attorney, petitions this Court pursuant to Fed. R. Civ. P. 54(d) and 15 U.S.C. §§ 1681n and 1681o for her reasonable attorney's incurred in this case. In support of this petition, Plaintiff states as follows:

1. On May 10, 2005, Defendants filed Defendants' Offer of Judgment pursuant to Fed. R. Civ. P. 68 (Defendants' offer).
2. Defendants' offer provides that Defendants agree to entry of judgment against them in the amount of \$1,000.00 (inclusive of interest and costs) plus reasonable attorney's fees to be determined by this Court.
3. On May 17, 2005, Plaintiff filed her acceptance of Defendants' offer.
4. On May 18, 2005 this Court entered judgment on Plaintiff's acceptance of Defendants' offer.
5. Plaintiff is entitled to her reasonable attorney's fees pursuant to both Rule 68 and 15 U.S.C. § 1692k(a)(3).
6. Plaintiff submits in support of her petition the Declaration of Yvonne W. Rosmarin, her

attorney (Exhibit 1), her attorney's itemized time records for this case (Exhibit 2), a June 3, 2004 Order in *Osofsky v. Sears, Roebuck & Co.*, No. 03-11192 JLA (D. Mass.)<sup>1</sup> awarding attorney's fees for Plaintiff's counsel's work on a motion to compel in that case (Exhibit 3), the Declaration of John Roddy (Exhibit 4) and the Declaration of Edwin E. Smith (Exhibit 5). This petition is also accompanied by Plaintiff's Memorandum in Support of Her Petition for Attorney's Fees.

7. Should Plaintiff incur additional attorney's fees in pursuing this petition, Plaintiff will supplement her attorney's itemized time records accordingly.

WHEREFORE, Plaintiff respectfully requests this Court to:

- A. Award Plaintiff her reasonable attorney's fees incurred in this case, in the amount of \$22,197.50;
- B. Enter judgment accordingly; and
- C. Grant such other relief as may be just and proper.

Dated: May 31, 2005

s/Yvonne W. Rosmarin  
Yvonne W. Rosmarin BBO # 566428  
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<sup>1</sup> *Osofsky v. Sears, Roebuck & Co.* involved the Fair Credit Reporting Act, another consumer protection statute.